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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

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<p>KEYSSA, INC., Plaintiff, vs. ESSENTIAL PRODUCTS, INC., Defendant.</p>	<p>CASE NO. 4:17-cv-05908-HSG JOINT STIPULATION AND [PROPOSED] ORDER REGARDING KEYSSA, INC.'S SERVICE OF TRADE SECRET DISCLOSURES AFTER ENTRY OF A PROTECTIVE ORDER Jury Trial Demanded</p>
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Pursuant to Civil Local Rules 6-2, Plaintiff Keyssa, Inc. (“Keyssa”) and Defendant Essential Products, Inc. (“Essential”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

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WHEREAS, pursuant to the Court’s February 5, 2019 Amended Scheduling Order (Dkt. No. 46), Keyssa is required to serve its Trade Secret Disclosures no later than March 8, 2019;

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WHEREAS the parties have yet to reach final agreement on the scope of a proposed Protective Order in this matter, and therefore no Protective Order has yet been entered by this Court;

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WHEREAS the parties expect to file a stipulated, proposed Protective Order on March 6, 2019;

WHEREAS good cause exists for Keyssa to refrain from serving its Trade Secret Disclosures until after the entry of a Protective Order because, by necessity, Keyssa's Trade Secret Disclosures will contain Keyssa's confidential, trade secret information, Keyssa would be harmed by unrestricted disclosure of its confidential trade secret information, and such an Order shall govern the process for serving and handling confidential information in this case;

WHEREAS this Stipulation is accompanied by the concurrently-filed Declaration of Sam Stake in Support of the Joint Stipulation and [Proposed] Order Regarding Keyssa, Inc.'s Service of Trade Secret Disclosures After Entry of a Protective Order;

9 **NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT** the
10 March 8, 2019 deadline for Keyssa to serve its Trade Secret Disclosures pursuant to California Code
11 Civ. Proc. § 2019.210 be vacated. Keyssa shall not serve its Trade Secret Disclosures upon Essential
12 until such time that the Court enters a Protective Order governing the service and handling of
13 confidential information in this matter. Keyssa shall serve its Trade Secret Disclosures upon Essential
14 immediately upon entry of such a Protective Order, and in no event later than within one (1) day
15 following the entry of such an order.

IT IS SO STIPULATED.

* * * *Signatures on following page.* * * *

1 Dated: March 6, 2019

Respectfully submitted,

2 QUINN EMANUEL URQUHART & SULLIVAN, LLP

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By:/s/ Daid Eiseman

5 David Eiseman
6 Charlie K. Verhoeven
7 Sam Stake

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21 *Attorneys for Plaintiff Keyssa, Inc.*

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Dated: March 6, 2019

Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

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By:/s/ Ryan K. Wong

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Attorneys for Defendant Essential Products, Inc.

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 6, 2019

/s/ David Eiseman
David Eiseman

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED the March 8, 2019 deadline
Keyssa to serve its Trade Secrets Disclosures pursuant to California Code Civ. Proc. § 2019.210 is
vacated. Keyssa shall not serve its Trade Secret Disclosures upon Essential until such time
the Court enters a Protective Order governing the service and handling of confidential information
matter. Keyssa shall serve its Trade Secret Disclosures upon Essential immediately upon entry
of a Protective Order, and in no event later than within one (1) day following the entry of such an

Dated: _____, 2019

HAYWOOD S. GILLIAM, JR.
United States District Judge